

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- x
CMG HOLDINGS GROUP, INC., as successor to :
XA THE EXPERIENTIAL AGENCY, INC., : Civil Action No.: 15-cv-05814-JPO
Plaintiff, :
vs. :
JOSEPH WAGNER, HUDSON GRAY LLC, :
DARREN ANDERECK, JESSIE LOMMA, :
MICHAEL DAY, JEAN WILSON, ESTELLE :
PIZZO, STUDIO AG, LLC, REMIGIO GUDIN, :
and MIXED COMPANY, INC., :
Defendants. :
----- x
JOSEPH WAGNER, JEFFREY SMITH, DARREN :
ANDERECK, and JESSIE LOMMA, :
Third-Party Plaintiffs, :
vs. :
GLENN LAKEN and ALEXIS LAKEN, :
Third-Party Defendants. :
----- x

JEAN WILSON, pursuant to 28 U.S.C. § 1746, hereby declares under penalty of perjury
that the following is true and correct:

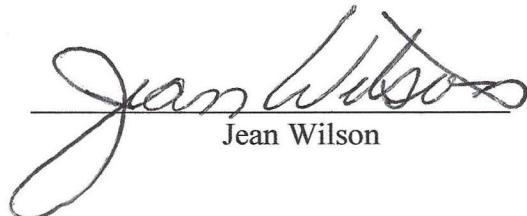
1. I am a defendant herein and am the Chief Operating Officer of defendant HudsonGray, Inc. I am fully familiar with the facts and circumstances set forth below.
2. I submit this Declaration in support of Defendants' motion to dismiss the First Amended Complaint, pursuant to Federal Rule of Civil Procedure 12(b)(6).

No Agreement With XA

3. While I was employed with XA, I never signed any employment handbook that contained a non-solicitation provision, or entered into any written employment or non-solicitation agreement.

WHEREFORE, I respectfully request that this Court grant Defendants' motion to dismiss the First Amended Complaint.

Executed on August 7, 2015.



Jean Wilson